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February 10, 2016

VIA E-MAIL: icommish@doi.nv.gov

Acting Commissioner Amy L. Parks
Nevada Division of Insurance
1818 East College Parkway, Suite 103
Carson City, NV 89706

Re: NAC 689A.020

Dear Commissioner:

In reviewing the text of the existing regulation, NAC 689A.020, the regulation currently defines advertisement to include, "printed and published material and descriptive literature used in newspapers, magazines, radio and television scripts, billboards and *similar displays*." Accordingly, the regulation already permits the Department to interpret the term "Advertisement" to include similar displays. Therefore, it is not necessary to amend the regulation to include Internet Websites.

While our comments and your questions raised other issues, addressing those issues would require additional time and work to resolve. We believe that the Division's primary intentions are to remove the burdensome filing requirements in NAC 689A.270 and to delete provisions that have become legally obsolete. By simply deleting the phrase "internet websites" as being redundant, we believe that no other revision would be necessary to accomplish the primary goal and the Proposed Regulation could be heard as scheduled on February 17, 2016 and would not require an additional workshop.

We urge your favorable consideration of this suggestion and further offer to work with Division staff over the course of the year on any other issues that remain.

Sincerely,



James L. Wadhams

JWAD/lt